CCTV POLICY

Date of Policy	August 2026
Approved by Head Teacher	August 2026
Next Review Date	August 2027
Lead for Review	Head Teacher

1. INTRODUCTION

1.1 CATS Global Schools (**CGS**) has in place a CCTV surveillance system at its UK centres in Cambridge, Canterbury and London "the CCTV system". This policy details the purpose, use and management of the CCTV system within CGS, it also and details the procedures to be followed in order to ensure that CGS complies with relevant legislation and the current Information Commissioner's Office Code of Practice.

1.2 CGS has due regard to the Data Protection Act 2018 (DPA), the UK General Data Protection Regulation (GDPR), the Protection of Freedoms Act 2012, the Human Rights Act 1998 and other relevant data protection and privacy legislation. Although not a relevant authority, CGS pays due regard to the Surveillance Camera Code of Practice, issued under the Protection of Freedoms Act 2012 and in particular the 12 guiding principles[1] it contains.

1.3 This policy is based upon guidance issued by the Information Commissioner's Office, *'Video surveillance (including guidance for organisations using CCTV)* [2]

1.4 This policy and associated procedures, applies to all of CGS's CCTV systems in the UK capturing images of identifiable individuals for the purpose of viewing and or recording the activities of such individuals. CCTV images are monitored and recorded in strict accordance with this policy.

1.5 This policy applies to all employees, officers, consultants, self-employed contractors, casual workers, agency workers, volunteers and interns. It also applies to anyone visiting our premises or using our vehicles.

1.6 A breach of this policy may, in appropriate circumstances, be treated as a disciplinary matter. Following investigation, a breach of this policy may be regarded as misconduct leading to disciplinary action, up to and including dismissal.

2. CCTV SYSTEM OVERVIEW

2.1 The CCTV system is owned and managed by CGS, and CGS is the 'data controller' for the images produced by the CCTV system. CGS is registered with the Information Commissioner's Office (ICO). The CCTV system operates to meet the requirements of the Data Protection Act and the Information Commissioner's Guidance.

2.2 The IT Director is responsible for the overall management and operation of the CCTV system, including activities relating to installations, recording, reviewing, monitoring, and ensuring compliance with this policy. Suggestions for changes to this policy should be reported to CGS's Data Protection Officer (DPO@catsglobalschools.com).

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[1] Surveillance Camera Code of Practice Pursuant to Section 29 of the Protection of Freedoms Act 2012 https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/157901/code-of-practice.pdf

[2] *Video surveillance (including guidance for organisations using CCTV)* https://ico.org.uk/for-organisations/uk-gdpr-guidance-and-resources/cctv-and-video-surveillance/guidance-on-video-surveillance-including-cctv

2.3 Signs are placed at in prominent locations to inform staff, students, visitors, and members of the public that CCTV is in operation. The signage clearly indicates that the system is managed by CGS, and a contact email address is provided for the Data Protection Officer.

2.4 The IT Director is responsible for ensuring that adequate signage is erected in compliance with the Information Commissioner's Guidance, in collaboration with the Head of Operations for each campus.

2.5 Cameras are sited to ensure that they cover entrances, exits and vulnerable public-facing areas of CGS's educational and residential premises.

2.6 As far as possible, cameras are not positioned to focus on private residential areas, cameras situated in CGS accommodation focus on entrances and communal areas. They are not sited in private areas, washrooms or changing rooms.

2.7 The CCTV system is operational and is capable of recording for 24 hours a day, every day of the year. There is a PC-based client to enable recordings to be viewed by authorised personnel.

2.8 Any proposed new CCTV installation is subject to a data protection impact assessment.

2.9 Further information regarding the number and location of CCTV cameras is available from the IT Director via the Data Protection Officer: DPO@catsglobalschools.com.

2.10 In the absence of the Data Protection Officer (DPO) and/or the onsite IT Technician, the Designated Safeguarding Lead (DSL) is authorised to access CCTV footage where there is a clear and justifiable safeguarding, welfare, or security concern requiring timely review.

Any such access must:

- Be necessary, proportionate and time-sensitive;
- Be recorded in accordance with internal logging procedures; and
- Be reported to the IT Director and DPO at the earliest available opportunity for retrospective oversight and compliance verification.

3. PURPOSES OF THE CCTV SYSTEM

3.1 We currently use the CCTV system as outlined below. We believe such use is necessary for legitimate business purposes including:

- for the safety of staff, students and visitors;
- to assist in the investigation of suspected breaches of policy or regulations by staff, visitors or students;
- to assist in day-to-day management, including ensuring the health and safety of staff and others;
- for the prevention, reduction, detection and investigation of crime and other incidents; and
- to support law enforcement bodies in the prevention, detection and prosecution of crime.

This list is not exhaustive, and other purposes may be or become relevant.

3.2 The CCTV system will be used to investigate any welfare, safety or security incidents that are reported and which require review of CCTV footage.

3.3 CGS operates its CCTV system in a manner that is consistent with respect for individuals' privacy.

4. MONITORING AND RECORDING

4.1 Images are recorded on cameras with localised recording capabilities and are viewable in accommodation and welfare service areas by authorised accommodation and welfare staff. Cameras may be monitored overnight by authorised accommodation and welfare supervisors, when accommodation is in use, to ensure student safety and adherence to the school's rules. Additional staff may be authorised by the Head Teacher , in liaison with the IT Director to monitor cameras sited within their own areas of responsibility on a view-only basis.

4.2 The cameras installed provide images that are of suitable quality for the specified purposes for which they are installed, all cameras are checked regularly to ensure that the images remain fit for purpose and that the date and time stamp recorded on the images is accurate.

4.3 All images recorded by the CCTV System remain the property and copyright of CGS.

4.4 The monitoring of staff activities will be carried out in accordance with Part 3 of the *Employment Practices Code*[3].

4.5 It is not currently the policy of CGS to use covert cameras. Should the need arise, any such request for the use of covert cameras will clearly state the purpose and reasons for use and require the approval of the Head of HR before any covert cameras are installed. The Head of HR should be satisfied that all other reasonable methods of prevention have been exhausted prior to the use of covert recording. Covert recording would only take place if informing the individual(s) concerned would seriously prejudice the reason for making the recording and where there are reasonable grounds to suspect that illegal or unauthorised activity is taking place. All such monitoring will be fully documented and will only take place for a limited and reasonable period.

4.6 CCTV systems will not be used to record sound.

5. COMPLIANCE WITH DATA PROTECTION LEGISLATION

5.1 In its administration of its CCTV system, due regard will be given to the data protection principles which provide that personal data shall be:

a) processed lawfully, fairly and in a transparent manner;

[3] https://ico.org.uk/media/for-organisations/documents/1064/the_employment_practices_code.pdf

b) collected for specified, explicit and legitimate purposes and not further processed in a manner that is incompatible with those purposes;
c) adequate, relevant and limited to what is necessary in relation to the purposes for which they are processed;
d) accurate and, where necessary, kept up to date;
e) kept in a form which permits identification of the data subjects for no longer than is necessary for the purposes for which the personal data are processed;
and
f) processed in a manner that ensures appropriate security of the personal data, including protection against unauthorized or unlawful processing and against accidental loss, destruction, or damage, using appropriate technical or organisational measures.

5.2 Access to CCTV footage is strictly limited to authorised personnel and will only be granted where there is a legitimate and lawful basis, including safeguarding, security, disciplinary or legal purposes.

The following restrictions apply:

- CCTV footage must not be accessed for routine curiosity or non-essential purposes;
- Viewing must take place in a secure environment to prevent unauthorised disclosure;
- Footage must not be copied, downloaded, shared or recorded on personal devices;
- Any sharing of footage must comply with the Data Protection Act 2018 and UK GDPR, including the principles of data minimisation and purpose limitation;
- Where footage includes identifiable individuals, disclosure will be carefully assessed to avoid unlawful processing or breach of third-party rights.

All access and viewing activity must be logged, including the date, time, purpose, and authorising individual.

6. APPLICATIONS FOR DISCLOSURE OF IMAGES

Applications by individual data subjects

6.1 Requests by individual data subjects for images relating to themselves – a "Subject Access Request" should be submitted in writing to the Data Protection Officer DPO@catsglobalschools.com or to the HR Department HR@catsglobalschools.com together with proof of identification.

6.2 In order to locate the images on the CCTV system, sufficient detail must be provided by the data subject in order to allow the relevant images to be located and the data subject to be identified.

6.3 Where CGS is unable to comply with a Subject Access Request without disclosing the personal data of another individual who is identified or identifiable from that information, it is not obliged to comply with the request unless satisfied that the other individual has provided their express consent to the disclosure, or if it is reasonable, having regard to the circumstances, to comply without the consent of the other individual.

Access to and disclosure of images to third parties

6.4 A request for images made by a third party should be made in writing to the Data Protection Officer, IT Director or Head Teacher who will liaise in response to the request.

6.5 In limited circumstances it may be appropriate to disclose images to a third party, such as when a disclosure is required by law, in relation to the detection or prosecution of a crime or in other circumstances where an exemption applies under relevant legislation.

6.6 Such disclosures will be made at the discretion of the IT Director, with reference to relevant legislation and where necessary, following advice from the Data Protection Officer.

6.7 Where a suspicion of misconduct arises and at the formal request of the Head of HR, the IT Director may provide access to CCTV images for use in staff disciplinary cases.

6.8 The IT Director may provide access to recorded CCTV images when required as evidence in relation to student discipline cases, at the request of the Head Teacher /Rector.

6.9 A record of any disclosure made under this policy will be logged by the IT Director, itemising the date, time, camera, requestor, authoriser and reason for the disclosure.

6.10 All requests to access, review or extract CCTV footage must be formally submitted via the school's internal IT service management system (SysAid). Requests must follow the prescribed process:

IT SysAid → Submit an Incident → IT Service Category → CCTV → Access Request

No CCTV footage will be accessed, reviewed, or disclosed unless a valid request has been submitted through this system. This ensures an auditable record of all access requests and supports compliance with data protection and accountability requirements.

7. RETENTION OF IMAGES

7.1 Unless required for evidential purposes, the investigation of an offence or as required by law, CCTV images will be retained for no longer than 14 days from the date of recording.

7.2 Where an image is required to be held for longer than 14 days, the IT Director, or their nominated deputy, will be responsible for authorising such a request with regard to student-related incidents. The Head of HR or their nominated deputy will be responsible for authorising requests to retain information relating to staff incidents.

7.3 Images held in excess of 14 days will be reviewed on a three-monthly basis and any not required for evidential purposes will be deleted. Once an investigation and any further appeals have been fully completed, footage will be deleted from its offline storage area.

7.4 Access to retained CCTV images is restricted to the IT Director and other persons as required and as authorised by the IT Director.

8. COMPLAINTS PROCEDURE

8.1 For complaints concerning CGS's use of its CCTV system or the disclosure of CCTV images please refer to the Complaints Policy, available per centre at www.catseducation.com/policies .

9. MONITORING COMPLIANCE

9.1 All staff involved in the operation of the CCTV system will be made aware of this policy and will only be authorised to use the CCTV system in a way that is consistent with the purposes and procedures contained therein.

9.2 All staff with responsibility for accessing, recording, disclosing or otherwise processing CCTV images will be required to undertake data protection training.

10. POLICY REVIEW

10.1 CGS's use of the CCTV system and the content of this policy shall be reviewed annually by the IT Director with reference to the relevant legislation or guidance in effect at the time. Further reviews will take place as required by changes in circumstance.